

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 **HKM EMPLOYMENT ATTORNEYS LLP**

1785 E. Sahara Ave, Suite 325

Las Vegas, NV 89104

4 Tel: (702) 625-3893

Fax: (702) 625-3893

5 E-mail: jfoley@hkm.com

Attorney for Plaintiff

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 COLLEEN HARRINGTON, An Individual) CASE NO. **2:18-cv-00009-APG-PAL**

9)
10 Plaintiff,)

11 vs.)

12 STATE OF NEVADA, ex rel. COLLEGE)
13 OF SOUTHERN NEVADA, DOES I-X.)

14 Defendants.)
15)

16 **STIPULATION AND ORDER TO EXTEND THE TIME TO RESPOND TO**
17 **DEFENDANT'S MOTION TO DISMISS**
18 **(SECOND REQUEST)**

19 COMES NOW, the Plaintiff, COLLEEN HARRINGTON ("Harrington"), by and
20 through her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT
21 ATTORNEYS LLP, and Defendant, STATE OF NEVADA, ex rel. COLLEGE OF
22 SOUTHERN NEVADA ("CSN"), by and through its attorney, DIANE L. WELCH, ESQ., of
23 OFFICE OF GENERAL COUNSEL FOR THE COLLEGE OF SOUTHERN NEVADA,
24 hereby stipulate and agree as follows:

25 1. That the Opposition to the Defendant's Motion to Dismiss currently due on
26 February 22nd, 2018, may be due on March 1st, 2018.

1 2. That the Reply to the Opposition to the Defendant's Partial Motion to Dismiss
2 be due on March 15th, 2018.

3 3. This extension of time is made in good faith and not for purpose of delay and is
4 based on Plaintiff's council having a death in the family.

5 4. This is the second request for an extension of time in this matter.
6

7
8 Dated this 23rd day of February, 2018.
9 2018.

Dated this 23rd day of February,

10 **HKM Employment Attorneys LLP**

Office of General Counsel

11
12 /s/ Jenny L. Foley
13 Jenny L. Foley, Ph.D., Esq.
14 Nevada Bar No. 9017
15 1785 East Sahara Ave., Suite 325
Las Vegas, Nevada 89104

/s/ Diane L. Welch
Diane L. Welch, Esq.
Nevada Bar No. 11738
6375 W. Charleston Blvd.
Las Vegas, Nevada 89146


16
17
18
19
20
21
22
23
24
25 ///

26 ///

27 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

IT IS SO ORDERED that the Opposition to the Defendant's Partial Motion to Dismiss shall be due on March 1st, 2018;


UNITED STATES DISTRICT JUDGE
Dated: February 27, 2018.

/s/ Jenny L. Foley

Jenny L. Foley, Ph.D., Esq.
Nevada Bar No. 9017
1785 East Sahara Ave, Suite 325
Las Vegas, Nevada 89104
Attorney for Plaintiff